

ORIGINAL

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA A. WILHELM,
Plaintiff

v.

COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants

NO. 1:CV-01-1057

(JUDGE RAMBO)

FILED

MAY 05 2003

MARY E. D'ANDREA, CLERK
PER [Signature] HBG, PA DEPUTY CLERK

PETITION FOR AWARD OF ATTORNEYS' FEES AND
COSTS

Now comes the plaintiff in the above-captioned action and moves this Court for an award of attorneys' fees to be paid by the defendants pursuant to 42 U.S.C. § 2000e-5(k). In support of this motion, the plaintiff states as follows:

1. This action was brought by the plaintiff, Barbara A. Wilhelm, against the defendants, *Commonwealth of Pennsylvania, Pennsylvania State Police, et al*, under Civil Rights Act of 1964, *as amended*, 42 U.S.C. § 2000e, seeking damages and other relief for injuries suffered by the plaintiff.

2. Pursuant to 42 U.S.C. § 2000e-5(k), this Court may award reasonable attorneys' fees to the prevailing party in an action under Civil Rights Act of 1964, *as amended*, 42 U.S.C. § 2000e.

3. On September 11, 2002, a jury entered a verdict which found in favor of the plaintiff on her claim pursuant to Civil Rights Act of 1964, *as amended*, 42 U.S.C. § 2000e, and awarded her damages in the amount of \$250,000. A copy of the verdict is attached hereto as Exhibit A to this motion.

4. By virtue of the above-referenced verdict, the plaintiff is a prevailing party within the meaning of 42 U.S.C. § 2000e-5(k).

5. Plaintiff's attorney in this matter was Nathan C. Pringle, Jr., who actively represented the plaintiff from December 29, 1999 to May 5, 2003.

6. Attached to this motion is an affidavit setting forth the hours expended and the legal services provided by plaintiff's attorney, time sheets detailing the services performed, a statement with respect to the prevailing hourly rate for those services in the local community, and sheet detailing expenses incurred by me in this matter.

7. As set forth in the attached affidavits, plaintiff's attorney expended 1757.7 hours performing necessary legal services in connection

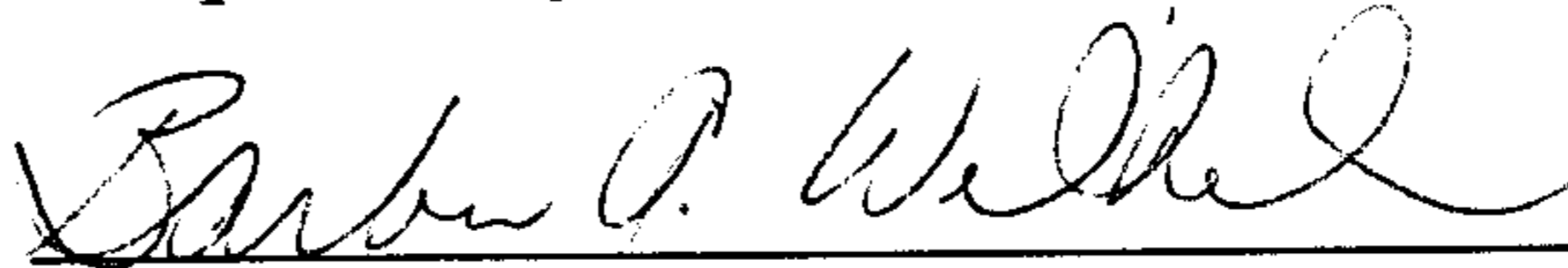
with plaintiff's successful claims in this matter, and a reasonable hourly rate for plaintiff's attorney is \$175.

8. I incurred costs in the amount of \$28,872.15.

9. My attorney incurred costs in the amount of \$807.40.

WHEREFORE, the plaintiff respectfully requests that this Court award her reasonable attorneys' fee and costs as part of the costs taxable against the defendant in this action in the amount of \$381,044.55.

Respectfully Submitted,



Barbara A. Wilhelm - Plaintiff



Nathan C. Pringle, Jr.

Attorney ID #30142

3601 North Progress Avenue

Suite 200

Harrisburg, Pennsylvania 17110

(717) 909-8520

Attorney for Plaintiff

Dated: May 5

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

BARBARA A. WILHELM,
Plaintiff

V.

COMMONWEALTH OF PA.; :

PENNSYLVANIA STATE POLICE; :

COLONEL PAUL J. EVANKO, :

COMMISSIONER; LIEUTENANT :

COLONEL THOMAS K. COURY; and :

CAPTAIN MICHAEL. D. SIMMERS, :

Defendants :

NO. 1:CV-01-1057

(JUDGE RAMBO)

**AFFIDAVIT IN SUPPORT OF MOTION FOR AWARD
OF ATTORNEYS' FEES AND COSTS**

I, Nathan C. Pringle, Jr., under oath do hereby state the following
under the pains and penalties of perjury:

1. I am an attorney at law duly licensed to practice before the courts of this state, and have been engaged in the active practice of law for 25.5 years, specializing in the litigation of employment law cases. I am a 1979 graduate of the Temple University Law School, and I am solo practitioner. I worked as an appellate review officer for the Equal Employment Opportunity Commission, represented the Commonwealth of Pennsylvania and AMETEK, Inc., as employment counsel, and numerous plaintiffs in proceedings involving claims for damages or other relief arising out of Civil

Rights Act of 1964, *as amended*, 42 U.S.C. § 2000e. A copy of my resume is attached as Exhibit B.

2. I am the attorney of record for the plaintiff in the above-captioned action, and have represented the plaintiff with regard to the subject matter of this action since December 29, 1999, when I was retained by the plaintiff pursuant to a written agreement to pursue a claim against the defendant for injuries suffered by the plaintiff arising out of her retaliation and termination with respect to her employment as a Legislative Specialist for the Pennsylvania State Police.

3. In the course of my representation of the plaintiff in this matter, I have expended the following hours performing necessary legal services in connection with plaintiff's successful claims:

A. Preparation and Court appearances	383	Hours
B. Prepare for and attend depositions	503.4	Hours
C. Draft and review correspondence	22.9	Hours
D. Legal research	166	Hours
E. Preparing and drafting of pleadings	142.8	Hours
F. Conferences with client, opposing counsel, witnesses and court	181.6	Hours
G. Review of transcripts, pleadings, orders, and documents	266.2	Hours

H. Telephone calls	.75 Hours
I. Other Services	91.05 Hours
TOTAL	1757.70 Hours

4. Attached to this affidavit, as Exhibit C are contemporaneous time records detailing the legal services I performed in this matter.

5. In the course of my representation of the plaintiff in this matter, I incurred the following reasonable and necessary expenses in handling plaintiff's case:

A. Photocopying	\$ 273.80
B. Parking	\$ 112.00
C. Filing fees	\$ 150.00
D. Travel (mileage and toll)	\$ 84.10
E. Process services	\$ 187.50
TOTAL	\$ 807.40

6. The time required to represent plaintiff was substantial in order to review over two thousand pages of documents containing rules, regulations and other business records, four audio tapes, and over sixteen hundred pages of transcript.

7. My normal hourly rate for legal services in the type of matter involved in the instant case is \$200. As set forth in the affidavit of Attorney Ricardo Hicks which is attached as Exhibit D, this rate is within the range of prevailing market rates in the local community for legal

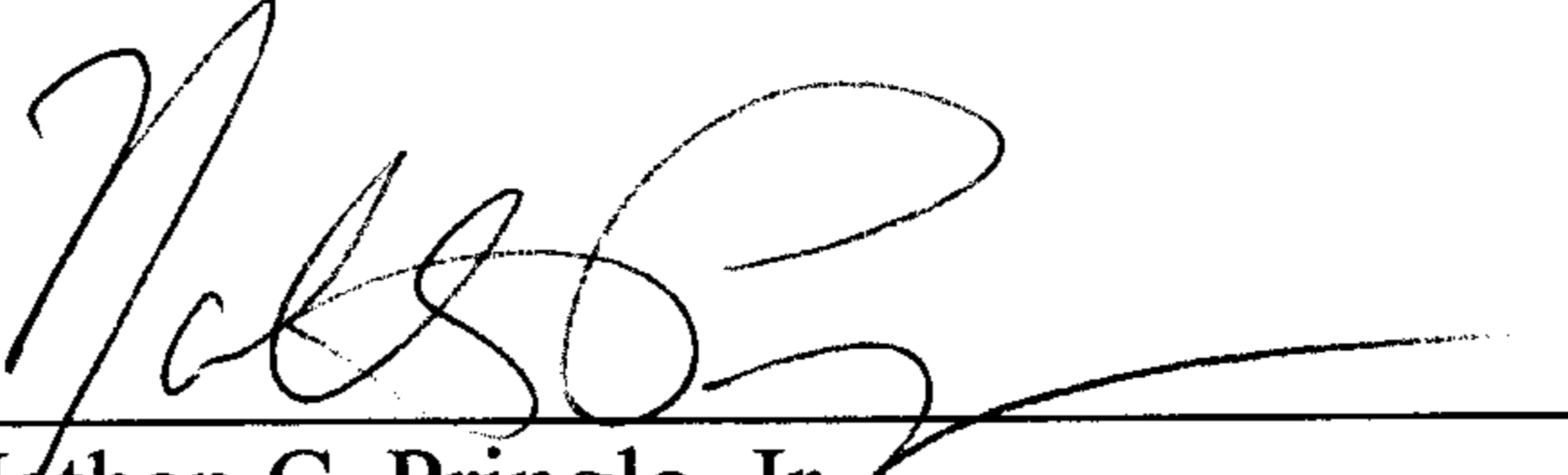
services in this type of matter by attorneys with comparable skill and experience, and is a reasonable hourly rate in this matter.

8. The plaintiff incurred some additional expenses in the course of this litigation. They are:

A. Deposition and trial transcripts	\$ 6,440.4
B. Deposition appearance fee-defendants' expert	\$ 1,100.00
C. Plaintiff's expert witness	\$ 20,766.00
D. Chart and supplies	\$ 58.29
E. Medical records	\$ 22.78
F. Parking	\$ 89.00
G. Photocopying	\$ 400.08
H. Postage	\$ 18.38
TOTAL	\$ 28,872.15

9. Attached as Exhibit E is the unsworn statement of Barbara Wilhelm and detailed cost sheet.

Signed under penalty of law:

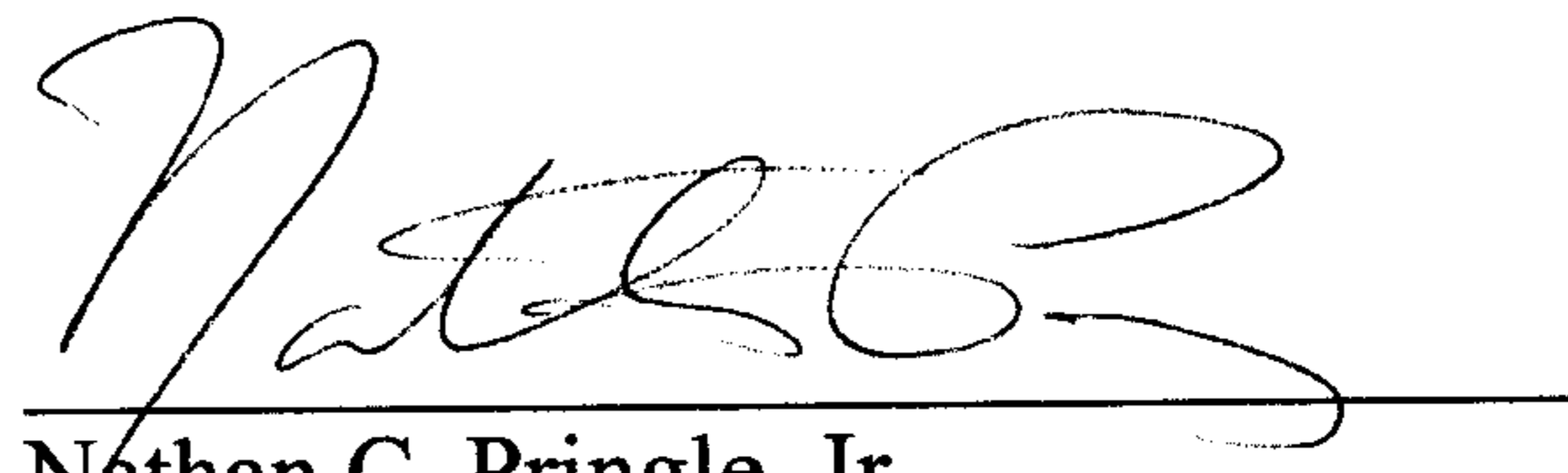

 Nathan C. Pringle, Jr.
 Attorney ID #30142
 3601 North Progress Avenue, Suite 200
 Harrisburg, Pennsylvania 17110
 (717) 909-8520

May 5, 2003

CERTIFICATE OF SERVICE

I, Nathan C. Pringle, Jr., hereby certify that on May 5, 2003, I caused to be delivered by first-class mail a copy of the Plaintiff's Petitioner for Attorney's Fees and costs upon the following:

Susan J. Forney
Chief Deputy Attorney General
Office of Attorney General
Litigation Section
15th Floor, Strawberry Square
Harrisburg, PA 17120



Nathan C. Pringle, Jr.

EXHIBIT A

(73)

9-12-02

MA

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

BARBARA WILHELM,

Plaintiff

v.

COMMONWEALTH OF
PENNSYLVANIA,

Defendant

CIVIL NO.1:CR-01-1057

FILED

SEP 11 2002

PER MA
HARRISBURG, PA DEPUTY CLERK

VERDICT FORM

1. Did Plaintiff prove, by a preponderance of the evidence, that she was dismissed from her job because she complained about sex discrimination?

☒ Yes

☐ No

If your answer is "Yes," proceed to question 2. If your answer is "No," sign the verdict form and inform the court deputy that you have reached a verdict.

2. If your answer to question 1 is "Yes," did Plaintiff prove, by a preponderance of the evidence, that she was damaged as a result of her dismissal?

☒ Yes

☐ No

If your answer is "Yes," proceed to question 3. If your answer is "No," sign the verdict form and inform the court deputy that you have reached a verdict.

3. If your answer to questions 1 and 2 is "Yes," what damages do you award Plaintiff?

\$ 250,000.00

Sign the verdict form and inform the court deputy that you have reached a verdict.

Donald David Bergman
JURY FOREPERSON

Date: 9/11/02

EXHIBIT B

NATHAN C. PRINGLE, JR.
ATTORNEY AT LAW

3601 N. Progress Ave.
Harrisburg, PA 17110
Voice: (717) 909 - 8520
Fax: (717) 909 - 8550
E-mail: npringle@ezonline.com

**BACKGROUND
SUMMARY:**

Decisive, energetic, creative, and resourceful legal professional, with extensive experience and success in the following:

- Negotiation of multi-million dollar contracts
- Communication with staff and executive level decision makers
- Project manager
- Collective bargaining
- Contract and employment litigation
- Visionary problem-solving

**PROFESSIONAL
EXPERIENCE:**

NATHAN C. PRINGLE, JR., ATTORNEY AT LAW, Hbg., PA Jan., 2000 to
General Practitioner Present

- Solo practice with a federal, state and local caseload focusing on employment law and contract law.

AMETEK, Inc., Paoli, PA. Jan., 1998 to
Employment and Labor Counsel to Human Resources Dec., 1999

Served as the resource for resolution of complex employee/labor relations issues affecting any of this manufacturing company's twenty-two facilities (union and non-union) in the U.S.

- Chief negotiator for collective bargaining.
- Project leader for OFCCP corporate compliance and "glass-ceiling" audits.
- Project leader for the development of the company policy manual.
- Successfully represented clients in employment disputes (arbitration, NLRB, EEOC, several state civil rights commissions).
- Revised the company's severance release document so that it complied with the OWBPA.
- Trained the company's facility HR managers on a variety of legal issues including: Sexual harassment, union avoidance, FLSA, FMLA, WARN, OFCCP audits.
- Project leader for the company's diversity initiative.

NATHAN C. PRINGLE, JR.

PAGE TWO

COMMONWEALTH OF PENNSYLVANIA, Harrisburg, PA. Nov., 1980
Deputy Chief Counsel, Governor's Office of Administration to Jan., 1998
 Managed legal and administrative staff responsible for providing legal services in employee/labor relations matters and information technology.

- Negotiated and reviewed over 750 contracts annually, resulting in enhanced services at substantial savings.
- Provided legal oversight for all requests-for-proposals, markedly reducing litigation.
- Successfully litigated matters arising out of the request-for-proposal process.
- Chief negotiator in collective bargaining.
- Successfully represented clients in employment disputes (arbitration, PLRB, EEOC, State Civil Service Commission) in semi-skilled labor, health care, IT, law enforcement, social work, and various white collar environments.
- Successfully represented clients in appeals arising out of employment disputes, including appeals before the Supreme Court of Pennsylvania.
- Authored handbook for non-lawyers on making and responding to objections in arbitration hearings, which significantly improved advocacy effectiveness.

EQUAL EMPLOYMENT OPPORTUNITY COMMISSION Sept., 1979
EEOC Appellate Review Officer to Nov., 1980

- Issued final rulings on employment discrimination cases.

EDUCATION: TEMPLE UNIVERSITY SCHOOL OF LAW, Philadelphia, PA
J.D.
 UNIVERSITY OF PITTSBURGH
B.S., English Writing/Psychology

BAR Supreme Court of Pennsylvania
MEMBERSHIPS: U.S. Court of Appeals for the Third Circuit
 U.S. District Court for the Eastern District of Pennsylvania
 U.S. District Court for the Middle District of Pennsylvania

EXHIBIT C

Barbara A. Wilhelm

Time Record Details

Page 1

Start Date	Expense	Duration
12/29/1999	0.00 Meeting-Wilhelm	2.50 Hours
2/29/2000	0.00 Telephone-Wilhelm	0.80 Hours
3/6/2000	0.00 Meeting-Wilhelm	2.50 Hours
3/7/2000	0.00 Review documents provided by Wilhelm.	10.00 Hours
4/6/2000	0.00 Meeting-Wilhelm	2.10 Hours
4/7/2000	0.00 Meeting-Wilhelm	1.10 Hours
4/18/2000	0.00 Meeting-Wilhelm	2.80 Hours
5/1/2000	0.00 Meeting-Wilhelm	5.10 Hours
5/2/2000	0.00 Meeting-Wilhelm	3.00 Hours
5/3/2000	0.00 Meeting-Wilhelm	3.00 Hours
5/4/2000	0.00 Meeting-Wilhelm	3.10 Hours
5/11/2000	0.00 Meeting-Wilhelm	5.00 Hours
5/12/2000	0.00 Meeting-Wilhelm	4.00 Hours
5/12/2000	0.00 Review of materials provided by Wilhelm	4.00 Hours
6/13/2000	0.00 PHRC intake interview	2.60 Hours
8/14/2000	0.00 Meeting-Wilhelm	3.00 Hours
10/7/2000	0.00 Letter-Wilhelm	0.10 Hours
11/14/2000	0.00 Meeting-Wilhelm	2.60 Hours
12/21/2000	0.00 Meeting- at PHRC to amended PHRC complaint	2.10 Hours
1/8/2001	0.00 Draft-right to sue letter	0.30 Hours
3/26/2001	0.00 Telephone-Wilhelm	0.10 Hours
6/5/2001	0.00 Research for federal complaint	8.40 Hours
6/6/2001	0.00 Research for federal complaint	8.30 Hours
6/7/2001	0.00 Research federal complaint	7.30 Hours
6/8/2001	0.00 Research federal complaint	8.10 Hours
6/9/2001	0.00 Research for federal complaint	9.70 Hours
6/11/2001	0.00 Drafting federal complaint	8.10 Hours
6/12/2001	0.00 Drafting federal complaint	8.30 Hours
6/13/2001	0.00 Drafting federal complaint	5.00 Hours
6/13/2001	0.00 Meeting with Wilhelm	2.50 Hours
8/12/2001	0.00 Research-Plaintiff's motion for judgment on pleadings	2.10 Hours

Barbara A. Wilhelm

Time Record Details

Page 2

Start Date	Expense	Duration
8/13/2001	0.00	2.00 Hours
	Drafting Plaintiff's motion for judgment on pleadings	
8/13/2001	1.20	0.00 Hours
	copies-12	
8/17/2001	0.00	0.10 Hours
	Review of court order of 8/15/01	
8/30/2001	0.00	0.10 Hours
	Review of notice of conference	
9/5/2001	0.00	0.10 Hours
	Review-letter Forney ESQ	
9/5/2001	0.00	0.10 Hours
	Review-Defendant's motion for enlargement of time	
9/5/2001	0.00	6.10 Hours
	Review-Defendant's answer	
9/5/2001	0.00	2.00 Hours
	Meeting with Wilhelm	
10/4/2001	0.00	1.00 Hours
	Review-Defendants first request for documents	
10/4/2001	0.00	1.50 Hours
	Review-Defendants' initial disclosures	
10/4/2001	0.00	2.50 Hours
	Review-Defendants first set of interrogatories	
10/4/2001	0.00	2.20 Hours
	Meeting with Wilhelm	
10/5/2001	0.00	4.00 Hours
	Drafting-Joint case management plan including calls to Forney ESQ	
10/11/2001	0.00	0.20 Hours
	Scheduling conference	
10/17/2001	0.00	0.50 Hours
	Review-court order/case management	
11/2/2001	0.00	0.10 Hours
	Review-letter Forney ESQ	
11/5/2001	0.00	3.00 Hours
	Meeting with Wilhelm	
11/5/2001	0.00	5.00 Hours
	Preparing response to interrogatories and request for documents	
11/6/2001	0.00	7.90 Hours
	Preparing response to interrogatories and request for documents	
11/7/2001	0.00	8.50 Hours
	Preparing response to interrogatories and request for documents	
11/8/2001	0.00	3.00 Hours
	Meeting with Wilhelm	
11/8/2001	0.00	4.00 Hours
	Preparing response for interrogatories and requests for documents	
11/8/2001	0.00	2.00 Hours
	Drafting response to interrogatories and request for documents	
11/9/2001	0.00	5.00 Hours
	Meeting with Wilhelm	
11/13/2001	3.60	0.00 Hours
	copies-36	
12/11/2001	0.00	8.00 Hours
	Drafting-Plaintiff's interrogatories	
12/12/2001	0.00	5.00 Hours
	Drafting-Plaintiff's request for documents	
12/13/2001	0.00	1.00 Hours
	Meeting with Wilhelm	
12/13/2001	0.00	1.00 Hours
	Drafting Plaintiff's interrogatories and request for documents	
12/14/2001	6.60	0.00 Hours
	copies-66	
1/4/2002	0.00	0.30 Hours
	Telephone-Wilhelm	

Barbara A. Wilhelm

Time Record Details

Page 3

Start Date	Expense	Duration
1/4/2002	0.00 Telephone-Wilhelm	0.10 Hours
1/14/2002	0.00 Review letter-Forney ESQ	0.10 Hours
1/14/2002	0.00 Meeting with Wilhelm	3.00 Hours
1/15/2002	0.00 Preparation for meeting with Morris	1.70 Hours
1/15/2002	0.00 Telephone-Wilhelm	0.30 Hours
1/15/2002	0.00 Preparation Morris deposition	3.30 Hours
1/16/2002	0.00 Meeting with Morris	3.50 Hours
1/16/2002	0.00 Meeting with Wilhelm	4.00 Hours
1/17/2002	0.00 Review-letter from Forney ESQ	0.10 Hours
1/17/2002	0.00 Prep for Deposition- Morris	8.00 Hours
1/18/2002	0.00 Meeting-Forney to review documents	2.40 Hours
1/18/2002	4.00 Parking	0.00 Hours
1/19/2002	0.00 Preparation for Wilhelm deposition	10.00 Hours
1/21/2002	0.00 Prep-Wilhelm deposition	12.00 Hours
1/22/2002	0.00 Meeting with Morris	1.10 Hours
1/22/2002	0.00 Prep for Deposition-Morris	6.00 Hours
1/22/2002	0.00 Prep-Wilhelm deposition	2.00 Hours
1/23/2002	0.00 Prepare for Morris deposition	4.30 Hours
1/23/2002	0.00 Review letter-Forney ESQ	0.10 Hours
1/23/2002	0.00 Preparation for Morris deposition	7.00 Hours
1/24/2002	0.00 Meeting with Morris	2.70 Hours
1/24/2002	0.00 Preparation for Morris deposition	8.00 Hours
1/25/2002	0.00 Prep for Deposition-Bonney	9.20 Hours
1/26/2002	0.00 Prep for Deposition-Bonney	4.50 Hours
1/26/2002	0.00 Prep for Deposition-Morris	6.70 Hours
1/27/2002	0.00 Preparation for Merryman deposition	4.20 Hours
1/27/2002	0.00 Meeting with Wilhelm	4.20 Hours
1/28/2002	0.00 Deposition-Morris	5.30 Hours
1/28/2002	12.00 Parking	0.00 Hours
1/28/2002	0.00 Review-Defendants' response to interrogatories	1.10 Hours
1/28/2002	0.00 Meeting-Wilhelm	1.20 Hours

Barbara A. Wilhelm

Time Record Details

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Start Date	Expense	Duration
1/28/2002	0.00 Preparation-Wilhelm Deposition	5.00 Hours
1/29/2002	0.00 Prep for Deposition-Merryman	6.10 Hours
1/29/2002	0.00 Prep for Deposition-Rain	8.00 Hours
1/29/2002	5.10 copies-51	0.00 Hours
1/30/2002	0.00 Depositions-Merryman, Bonney, Rain	5.00 Hours
1/30/2002	0.00 Meeting with Wilhelm	3.00 Hours
1/30/2002	0.00 Preparation for Wilhelm deposition	6.00 Hours
1/31/2002	0.00 Deposition-Wilhelm	8.00 Hours
1/31/2002	12.00 Parking	0.00 Hours
2/1/2002	0.00 Meeting with Wilhelm	4.00 Hours
2/2/2002	0.00 Review-defendants response to interrogatories	7.00 Hours
2/4/2002	0.00 Meeting with Wilhelm	3.00 Hours
2/7/2002	0.00 Review letter-Forney ESQ	0.10 Hours
2/11/2002	0.00 Review letter-Forney ESQ	0.10 Hours
2/11/2002	0.00 Telephone-Forney ESQ	0.10 Hours
2/11/2002	0.00 Review defendants documents	4.00 Hours
2/12/2002	0.00 Review defendants documents	4.30 Hours
2/13/2002	0.00 Review transcript	12.00 Hours
2/14/2002	0.00 Review letter-Forney ESQ	0.10 Hours
2/14/2002	0.00 Review defendants documents	8.00 Hours
2/15/2002	0.00 Meeting with Wilhelm	4.30 Hours
2/16/2002	0.00 Review transcript	7.60 Hours
2/18/2002	0.00 Prep-Evanko Deposition	8.00 Hours
2/19/2002	0.00 Preparation for Evanko deposition	8.10 Hours
2/20/2002	0.00 Review transcript	12.50 Hours
2/25/2002	0.00 Prep for Deposition	8.00 Hours
2/26/2002	0.00 Prep for Deposition-Evanko	6.60 Hours
2/26/2002	0.00 Draft letter to Forney ESQ	0.50 Hours
2/26/2002	72.20 copies-722	0.00 Hours
2/27/2002	0.00 Prep for Deposition- Evanko	12.50 Hours
2/28/2002	0.00 Deposition of Evanko	4.50 Hours

Barbara A. Wilhelm

Time Record Details

Page 5

Start Date	Expense	Duration
2/28/2002	0.00	0.30 Hours
	Drafting-Plaintiff's motion for enlargement of time	
3/1/2002	0.00	10.00 Hours
	Preparation for deposition of Conley	
3/2/2002	0.00	10.00 Hours
	Preparation for deposition-Burholder	
3/3/2002	0.00	10.20 Hours
	Preparation-Plesco deposition	
3/4/2002	0.00	0.10 Hours
	Review-Defendants' motion to enlarge deadlines	
3/4/2002	0.00	0.10 Hours
	Review court order	
3/4/2002	0.00	10.00 Hours
	Preparation-Simmers deposition	
3/5/2002	0.00	10.00 Hours
	Preparation-Simmers preparation	
3/6/2002	0.00	10.00 Hours
	Preparation-Simmers deposition	
3/7/2002	0.00	10.00 Hours
	Preparation for Simmers deposition	
3/8/2002	0.00	0.10 Hours
	Review letter-Forney ESQ	
3/8/2002	0.00	10.00 Hours
	Preparation for Simmers deposition	
3/9/2002	0.00	9.00 Hours
	Preparation for Polek deposition	
3/10/2002	0.00	13.60 Hours
	Review transcript	
3/11/2002	0.00	0.10 Hours
	Review letter-Forney ESQ	
3/11/2002	0.00	4.00 Hours
	Meeting-Wilhelm	
3/11/2002	0.00	1.40 Hours
	Preparation for Miller depositon	
3/11/2002	0.00	0.10 Hours
	Telephone-Forney	
3/11/2002	0.00	6.60 Hours
	Preparation for Miller deposition	
3/12/2002	0.00	7.20 Hours
	Prep for Depositions-McHale	
3/12/2002	0.00	0.10 Hours
	Telephone-Forney ESQ	
3/13/2002	0.00	5.00 Hours
	Prep-deposition McHale	
3/13/2002	0.00	10.00 Hours
	Preparation-Polek deposition	
3/13/2002	53.70	0.00 Hours
	Copies-537	
3/14/2002	0.00	3.50 Hours
	Depositions-Miller, McHale	
3/14/2002	0.00	2.20 Hours
	Prep for Deposition-McNeal	
3/15/2002	0.00	4.60 Hours
	Preparation for Coury deposition	
3/15/2002	0.00	0.80 Hours
	Deposition-McNeal	
3/15/2002	0.00	5.00 Hours
	Preparation-Polek depostion	
3/16/2002	0.00	10.00 Hours
	Preparation for Polek deposition	
3/17/2002	0.00	10.00 Hours
	Preparation for Polek depostion	

Barbara A. Wilhelm

Time Record Details

Page 6

Start Date	Expense	Duration
3/18/2002	0.00 Review letter-Forney ESQ	0.10 Hours
3/18/2002	0.00 Prep for Deposition- Polek	10.10 Hours
3/19/2002	0.00 Prep for Depositions-Conley, Plesco, Burkholder, Polek	8.40 Hours
3/19/2002	0.00 Telephone-Forney ESQ	0.10 Hours
3/19/2002	0.00 Prep for depositions-Conley, Plesco, Burholder, Polek	4.40 Hours
3/19/2002	19.20 Copies-192	0.00 Hours
3/20/2002	0.00 Depositions-Conley, Plesco, Burkholder,Polek	6.60 Hours
3/20/2002	0.00 Prep for Deposition-Simmers, Balsbaugh, Spigelmyer	6.00 Hours
3/20/2002	42.60 Copies-426	0.00 Hours
3/21/2002	0.00 Depositions-Spigelmyer, Balsbaugh, Simmers	6.40 Hours
3/21/2002	0.00 Prep for Deposition-Coury	5.50 Hours
3/22/2002	0.00 Deposition-Coury	1.80 Hours
3/22/2002	0.00 Telephone-Wilhelm	0.10 Hours
3/23/2002	0.00 Preparation for Hickes deposition	8.00 Hours
3/25/2002	0.00 Preparation for Hickes deposition	12.00 Hours
3/26/2002	0.00 Prep for Deposition-Hickes	9.00 Hours
3/27/2002	2.70 copies-27	0.00 Hours
3/27/2002	0.00 Review letter-Forney ESQ	0.10 Hours
3/27/2002	0.00 Deposition-Hikes	1.80 Hours
3/28/2002	0.00 Meeting with Wilhelm	4.00 Hours
3/29/2002	0.00 Drafting-Plaintiff's motion for enlargement of time	0.30 Hours
3/29/2002	2.00 copies-20	0.00 Hours
4/4/2002	0.00 Review-court order	0.10 Hours
4/5/2002	0.00 Review transcript	12.00 Hours
4/6/2002	0.00 Research	5.00 Hours
4/7/2002	0.00 Review transcript	13.00 Hours
4/8/2002	0.00 Review letter-Forney	0.10 Hours
4/8/2002	0.00 Review transcript	12.00 Hours
4/9/2002	0.00 Review-transcript	2.30 Hours
4/9/2002	0.00 Meeting-Wilhelm	4.20 Hours
4/9/2002	0.00 Review-transcript	8.50 Hours

Barbara A. Wilhelm

Time Record Details

Page 7

Start Date	Expense	Duration
4/10/2002	Research	10.00 Hours
4/10/2002	Review-motion for leave to exceed 15 page limit	0.10 Hours
4/11/2002	Research	10.10 Hours
4/11/2002	Review-amended certificate of concurrence	0.10 Hours
4/12/2002	Meeting-Wilhelm	3.10 Hours
4/12/2002	Review transcript	6.80 Hours
4/13/2002	Drafting-motion for summary judgment/brief	8.00 Hours
4/14/2002	Draft-motion and brief /summary judgment	12.10 Hours
4/15/2002	Review- court order	0.10 Hours
4/15/2002	copies-52	0.00 Hours
4/17/2002	Review-Defendants' motion for summary judgment/brief	0.40 Hours
4/17/2002	Research	12.00 Hours
4/17/2002	Review-motion of enlargement of time	0.10 Hours
4/17/2002	Review-court order	0.10 Hours
4/18/2002	Research	12.00 Hours
4/19/2002	Research	12.00 Hours
5/2/2002	Review letter-Forney ESQ	0.10 Hours
5/2/2002	Meeting-Wilhelm	3.30 Hours
5/3/2002	Review-Defendants' brief in opposition to summary judgment/response to material facts	12.10 Hours
5/5/2002	Telephone-Wilhelm	0.30 Hours
5/5/2002	Telephone-Wilhelm	0.10 Hours
5/6/2002	Research	2.20 Hours
5/6/2002	Telephone-Wilhelm	0.10 Hours
5/6/2002	Research	5.80 Hours
5/7/2002	Drafting response to Defendants' statement of material facts	1.30 Hours
5/7/2002	Telephone-Wilhelm	0.10 Hours
5/7/2002	Drafting response to defendants' material facts	3.30 Hours
5/7/2002	Telephone-Wilhelm	0.30 Hours
5/7/2002	Drafting response to defendants' material facts	3.20 Hours
5/7/2002	Telephone-Wilhelm	0.10 Hours
5/7/2002	Draft-motion for enlargement of time	0.40 Hours

Barbara A. Wilhelm

Time Record Details

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Start Date	Expense	Duration
5/7/2002	0.00	8.50 Hours
	Drafting brief in opposition to motion for summary judgment	
5/8/2002	0.00	0.10 Hours
	Review-court order	
5/8/2002	18.40	0.00 Hours
	copies-184	
5/9/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
5/11/2002	0.00	8.20 Hours
	Research	
5/12/2002	0.00	8.10 Hours
	Drafting-reply to brief in opposition	
5/13/2002	0.00	0.20 Hours
	Telephone-Wilhelm	
5/13/2002	4.00	0.00 Hours
	copies-40	
5/23/2002	0.00	3.00 Hours
	Review-Defendants' reply brief	
5/29/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
6/3/2002	0.00	0.10 Hours
	Review-joint motion	
6/5/2002	0.00	0.60 Hours
	Review-motion in limine/Simmers	
6/5/2002	0.00	1.60 Hours
	Review-brief motion in limine/Simmers	
6/5/2002	0.00	0.90 Hours
	Review-documents/Simmers/motion in limine	
6/5/2002	0.00	0.10 Hours
	Review-court order	
6/6/2002	0.00	0.40 Hours
	Review-motion in limine/McNeal	
6/6/2002	0.00	2.00 Hours
	Review-brief motion in limine/McNeal	
6/6/2002	0.00	0.10 Hours
	Review-amended certificate of concurrence	
6/7/2002	0.00	12.00 Hours
	Research	
6/10/2002	0.00	4.00 Hours
	Meeting with Wilhelm	
6/12/2002	0.00	0.10 Hours
	Review-motion to remove case from August trial list	
6/15/2002	0.00	3.10 Hours
	Research	
6/15/2002	0.00	2.50 Hours
	Drafting-brief in opposition/motion in limine/Simmers	
6/15/2002	0.00	1.50 Hours
	Drafting-brief in opposition motion in limine/McNeal	
6/17/2002	0.00	4.10 Hours
	Review-letter Forney ESQ with documents	
6/17/2002	2.00	0.00 Hours
	Copies-20	
6/21/2002	0.00	1.00 Hours
	Review-letter Forney ESQ with documents	
6/21/2002	0.00	0.10 Hours
	Review-court order	
6/27/2002	0.00	1.50 Hours
	Review-reply in support of motion in limine/Simmers	
7/1/2002	0.00	1.50 Hours
	Review court order	
7/1/2002	0.00	5.00 Hours
	Research	

Barbara A. Wilhelm

Time Record Details

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Start Date	Expense	Duration
7/10/2002	0.00 Meeting-Wilhelm	3.50 Hours
7/11/2002	0.00 Meeting-Wilhelm	3.40 Hours
7/12/2002	0.00 Review-court orders	0.10 Hours
7/12/2002	0.00 Telephone-Forney ESQ	0.10 Hours
7/16/2002	3.20 copies-32	0.00 Hours
7/17/2002	0.00 Research	12.00 Hours
7/18/2002	0.00 Drafting pretrial memo	12.00 Hours
7/18/2002	0.00 Review-court order	0.10 Hours
7/19/2002	0.00 Trial preparation	2.70 Hours
7/19/2002	0.00 Telephone-Forney ESQ	0.10 Hours
7/19/2002	0.00 Trial preparation	9.30 Hours
7/22/2002	0.00 Trial preparation	10.00 Hours
7/23/2002	0.00 Trial preparation	12.00 Hours
7/24/2002	0.00 Trial preparation	10.00 Hours
7/25/2002	0.00 Trial preparation	10.00 Hours
7/26/2002	0.00 Trial preparation	1.90 Hours
7/26/2002	0.00 Telephone-Forney ESQ	0.10 Hours
7/26/2002	0.00 Trial preparation	8.30 Hours
7/27/2002	0.00 Draft-e-mail-Wilhelm	0.30 Hours
7/29/2002	0.00 Trial preparation	3.40 Hours
7/29/2002	0.00 Telephone-Forney ESQ	0.10 Hours
7/29/2002	0.00 Trial preparation	1.80 Hours
7/29/2002	0.00 Telephone-Forney ESQ	0.10 Hours
7/29/2002	0.00 Trial preparation	6.90 Hours
7/30/2002	0.00 Trial preparation	12.10 Hours
7/31/2002	0.00 Trial preparation	12.00 Hours
8/1/2002	0.00 Trial preparation	11.90 Hours
8/2/2002	0.00 Trial preparation	12.10 Hours
8/5/2002	0.00 Trial preparation	10.10 Hours
8/6/2002	0.00 Trial preparation	10.00 Hours
8/7/2002	0.00 Trial preparation	12.10 Hours

Barbara A. Wilhelm

Time Record Details

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Start Date	Expense	Duration
8/8/2002	0.00	1.20 Hours
	Trial preparation	
8/8/2002	0.00	3.30 Hours
	Meeting-Wilhelm	
8/8/2002	0.00	7.60 Hours
	Trial preparation	
8/12/2002	0.00	0.10 Hours
	Review-court order	
8/12/2002	0.00	9.50 Hours
	Trial preparation	
8/13/2002	0.00	12.10 Hours
	Trial preparation	
8/14/2002	0.00	2.40 Hours
	Meeting-Wilhelm	
8/15/2002	0.00	12.00 Hours
	Trial preparation	
8/16/2002	0.00	3.00 Hours
	Meeting-Wilhelm	
8/19/2002	0.00	1.00 Hours
	Review-Defendants' Exhibit List	
8/23/2002	0.00	0.50 Hours
	Meeting-Hazen	
8/24/2002	0.00	9.00 Hours
	Trial preparation	
8/25/2002	0.00	6.50 Hours
	Trial preparation	
8/26/2002	0.00	6.10 Hours
	Review-Defendants' pretrial memorandum including exhibits	
8/27/2002	0.00	0.10 Hours
	Review-court order	
8/27/2002	0.00	0.90 Hours
	Meeting with Hazen	
8/28/2002	0.00	12.00 Hours
	Research-jury selection	
8/29/2002	0.00	12.00 Hours
	Trial preparation	
8/30/2002	2.00	0.00 Hours
	Parking	
8/30/2002	0.00	0.60 Hours
	Pretrial conference & settlement discussions	
8/31/2002	0.00	12.00 Hours
	Prep for Trial	
9/1/2002	0.00	12.10 Hours
	Prep for Trial	
9/2/2002	0.00	9.00 Hours
	Prep for Trial	
9/3/2002	0.00	12.10 Hours
	Prep for Trial	
9/3/2002	0.00	0.10 Hours
	Review-court order	
9/3/2002	0.00	0.20 Hours
	Preparing fax for court	
9/3/2002	0.00	8.00 Hours
	Trial preparation	
9/4/2002	6.00	0.00 Hours
	Parking	
9/4/2002	0.00	4.00 Hours
	Jury selection & review with Wilhelm	
9/4/2002	0.00	8.10 Hours
	Trial preparation	
9/5/2002	0.00	0.30 Hours
	Deposition-Hazen	

Barbara A. Wilhelm

Time Record Details

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Start Date	Expense	Duration
9/5/2002	0.00 Trial preparation	6.00 Hours
9/7/2002	0.00 Meeting with Wilhelm	6.10 Hours
9/8/2002	0.00 Meeting -Wilhelm	5.00 Hours
9/9/2002	12.00 Parking	0.00 Hours
9/9/2002	0.00 Trial & reivew	11.80 Hours
9/10/2002	12.00 Parking	0.00 Hours
9/10/2002	0.00 Trial & review	10.90 Hours
9/11/2002	12.00 Parking	0.00 Hours
9/11/2002	0.00 Trial	8.20 Hours
9/12/2002	0.00 Telephone-Forney ESQ	0.20 Hours
9/12/2002	0.00 Meeting with Wilhelm-settlement	1.50 Hours
9/13/2002	0.00 Review-court order	0.10 Hours
9/18/2002	0.00 Review-letter Forney ESQ	0.10 Hours
9/25/2002	0.00 Review-status report	0.30 Hours
9/25/2002	0.00 Review-court order	0.10 Hours
9/25/2002	0.00 Review-court order	0.10 Hours
9/30/2002	0.00 Review-status report	0.10 Hours
10/3/2002	0.00 Review-court order	0.10 Hours
10/3/2002	0.00 Telephone-Wilhelm	0.10 Hours
10/4/2002	0.00 Research	3.00 Hours
10/7/2002	0.00 Telephone-Wilhelm	0.10 Hours
10/11/2002	0.00 Meeting-Boyer & Ritter	2.00 Hours
10/15/2002	0.00 Telephone-Wilhelm	0.10 Hours
10/17/2002	0.00 Meeting with Wilhelm	4.00 Hours
10/18/2002	0.00 Meeting -Murphy	1.50 Hours
10/21/2002	0.00 Review Murphy report	5.10 Hours
10/21/2002	0.00 Telephone-Forney ESQ	0.10 Hours
10/21/2002	0.00 Review Murphy report	6.90 Hours
10/22/2002	0.00 Meeting with Murphy	1.00 Hours
10/22/2002	0.00 Prep for equity hearing	0.70 Hours
10/22/2002	0.00 Telephone-Forney	0.20 Hours

Barbara A. Wilhelm

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Start Date	Expense	Duration
10/22/2002	0.00	3.90 Hours
	Prep-equity hearing	
10/22/2002	0.00	0.30 Hours
	Telephone-Wilhelm	
10/22/2002	0.00	0.20 Hours
	Telephone-Wilhelm	
10/22/2002	0.00	0.50 Hours
	Preparation-equity hearing	
10/23/2002	0.00	1.60 Hours
	Equity hearing	
10/23/2002	4.00	0.00 Hours
	Parking	
10/23/2002	0.00	1.10 Hours
	Review-Defendants' brief equitable relief	
10/23/2002	0.00	3.00 Hours
	Research	
10/24/2002	0.00	0.10 Hours
	Review-court order	
10/24/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
10/24/2002	0.00	0.30 Hours
	Telephone-Wilhelm	
10/25/2002	0.00	0.30 Hours
	Telephone-Wilhelm	
10/30/2002	0.00	0.40 Hours
	Review-Defendants' motion for reconsideration	
10/30/2002	0.00	1.80 Hours
	Research	
10/30/2002	0.00	2.30 Hours
	Review-brief motion for reconsideration	
10/30/2002	0.00	0.80 Hours
	Review-documents motion for reconsideration	
10/31/2002	0.00	1.20 Hours
	Review-Defendants' motion for attorney's fees	
11/1/2002	0.00	4.00 Hours
	Meeting-Wilhelm	
11/1/2002	0.00	2.00 Hours
	Meeting with Murphey	
11/4/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
11/4/2002	0.00	0.10 Hours
	Telephone-Forney ESQ	
11/4/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
11/7/2002	0.00	1.10 Hours
	Review-motion to expedite discovery	
11/7/2002	0.00	1.10 Hours
	Review-Defendants' second interrogatories	
11/7/2002	0.00	0.10 Hours
	Review-amended certificate of concurrence	
11/11/2002	0.00	0.10 Hours
	Review-letter Forney	
11/11/2002	0.00	0.10 Hours
	Review-letter Forney	
11/11/2002	0.00	0.60 Hours
	Review-brief/motion to expedite discovery	
11/11/2002	0.00	1.00 Hours
	Review-brief for attorney's fees	
11/12/2002	0.00	12.00 Hours
	Preparation for Murphy deposition	
11/13/2002	0.00	12.00 Hours
	Preparation for Murphy deposition	

Barbara A. Wilhelm

Time Record Details

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Start Date	Expense	Duration
11/14/2002	0.00	1.00 Hours
	Meeting with Murphy	
11/14/2002	0.00	3.10 Hours
	Research	
11/14/2002	0.00	0.20 Hours
	Review-fax letter-Forney ESQ	
11/15/2002	0.00	7.50 Hours
	Drafting-Plaintiff's brief in opposition to motion for reconsideration	
11/15/2002	5.00	0.00 Hours
	Parking	
11/15/2002	0.00	1.70 Hours
	Deposition-Murphy CPA	
11/18/2002	3.20	0.00 Hours
	copies-32	
11/20/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
11/20/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
11/21/2002	0.00	1.50 Hours
	Meeting-Wilhelm	
11/25/2002	0.00	2.10 Hours
	Drafting-brief in opposition to motion to expedite discovery	
11/25/2002	0.00	5.10 Hours
	Review expert report/Johnson	
11/26/2002	0.00	2.10 Hours
	Drafting-brief in opposition to motion for attorney's fees	
11/26/2002	0.00	2.50 Hours
	Meeting-Wilhelm	
11/26/2002	6.80	0.00 Hours
	copies-68	
11/26/2002	0.00	7.10 Hours
	Review-expert report/ Johnson	
11/27/2002	0.00	12.00 Hours
	Review expert report/Johnson	
11/29/2002	0.00	12.00 Hours
	Review Johnson report	
11/30/2002	0.00	3.50 Hours
	Review transcript	
12/4/2002	0.00	2.10 Hours
	Review-reply brief motion for reconsideration	
12/5/2002	0.00	13.10 Hours
	Drafting-response to second interrogatories	
12/6/2002	0.00	7.00 Hours
	Drafting-response to second interrogatories	
12/6/2002	14.00	0.00 Hours
	copies-140	
12/7/2002	0.00	0.30 Hours
	Telephone-Wilhelm	
12/9/2002	0.00	4.10 Hours
	Review-letter Forney ESQ with documents	
12/11/2002	0.00	0.10 Hours
	Review-court order	
12/12/2002	0.00	7.60 Hours
	Meeting-Wilhelm	
12/13/2002	0.00	5.80 Hours
	Review-letter Forney ESQ with documents	
12/13/2002	0.00	0.10 Hours
	Telephone-Forney ESQ	
12/13/2002	0.00	2.30 Hours
	Review-documents from Forney ESQ	
12/18/2002	0.00	0.10 Hours
	Review-court order	

Barbara A. Wilhelm

Time Record Details

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Start Date	Expense	Duration
12/18/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
12/18/2002	0.00	0.10 Hours
	Telephone-Forney ESQ	
12/18/2002	0.00	0.30 Hours
	Telephone-Wilhelm	
12/23/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
12/24/2002	0.00	9.50 Hours
	Prep for Deposition-Johnson	
12/26/2002	5.70	0.00 Hours
	57-copies	
12/26/2002	5.00	0.00 Hours
	Parking	
12/26/2002	0.00	2.50 Hours
	Deposition-Johnson	
12/26/2002	0.00	0.50 Hours
	Meeting-Wilhelm	
12/27/2002	0.00	0.10 Hours
	review-court order	
12/30/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
12/31/2002	0.00	0.10 Hours
	Telephone-Wilhelm	
1/2/2003	0.00	12.00 Hours
	Preparation-Barach CPA deposition	
1/3/2003	0.00	0.10 Hours
	Review-letter Forney ESQ	
1/3/2003	0.00	3.50 Hours
	Preparation for Barach CPA deposition	
1/3/2003	0.00	2.00 Hours
	Meeting with Murphy	
1/3/2003	0.00	5.50 Hours
	Preparation for Barach CPA deposition	
1/4/2003	0.00	12.00 Hours
	Prep-deposition Barach CPA	
1/5/2003	0.00	12.00 Hours
	Preparation for Barach CPA deposition	
1/6/2003	0.00	12.10 Hours
	Prep for Deposition-Barach CPA	
1/7/2003	0.00	11.10 Hours
	Deposition-Barach CPA	
1/7/2003	6.10	0.00 Hours
	toll-turnpike	
1/7/2003	14.00	0.00 Hours
	Parking	
1/10/2003	0.00	5.70 Hours
	Review dtranscript	
1/20/2003	0.00	0.10 Hours
	Review-letter Forney ESQ	
1/20/2003	0.00	3.10 Hours
	Review-letter Forney ESQ with enclosure	
1/24/2003	0.00	1.00 Hours
	Review-letter Forney ESQ	
1/24/2003	0.00	2.50 Hours
	Meeting with Wilhelm	
1/24/2003	0.00	4.50 Hours
	Review transcript	
1/25/2003	0.00	10.00 Hours
	Review transcript	
1/27/2003	0.00	0.10 Hours
	Review-letter Forney ESQ	

Barbara A. Wilhelm

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Start Date	Expense	Duration
1/27/2003	0.00 Preparation for equity hearing	12.00 Hours
1/28/2003	0.00 Prep-equity hearing	12.50 Hours
1/29/2003	0.00 Preparation for equity hearing	7.10 Hours
1/29/2003	0.00 Meeting with Murphy	1.50 Hours
1/29/2003	0.00 Preparation for equity hearing	5.00 Hours
1/30/2003	0.00 Prep for equity hearing	12.10 Hours
1/31/2003	0.00 Equity hearing	7.90 Hours
1/31/2003	12.00 Parking	0.00 Hours
1/31/2003	0.00 Meeting with Wilhelm	1.50 Hours
2/7/2003	0.00 Review-court order	0.50 Hours
2/7/2003	0.00 Review-letter Forney ESQ	0.10 Hours
2/7/2003	0.00 Research	3.00 Hours
2/13/2003	0.00 Review-court order	0.10 Hours
2/25/2003	0.00 Research-brief for interest	3.00 Hours
2/26/2003	0.00 Drafting-brief motion for interest	2.10 Hours
2/26/2003	0.00 Drafting-motion for interest	2.10 Hours
2/26/2003	1.20 copies-12	0.00 Hours
3/27/2003	0.00 Research-reply brief for interest	1.80 Hours
3/28/2003	0.00 Drafting-reply brief for interest	2.00 Hours
3/31/2003	1.20 copies-12	0.00 Hours
4/11/2003	0.00 Review-court order	0.10 Hours
5/2/2003	0.00 Drafting petition for attorney's fees	5.00 Hours

Summary Information

EXHIBIT D

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**BARBARA A. WILHELM,
Plaintiff**

v.

**COMMONWEALTH OF PA.;
PENNSYLVANIA STATE POLICE;
COLONEL PAUL J. EVANKO,
COMMISSIONER; LIEUTENANT
COLONEL THOMAS K. COURY; and
CAPTAIN MICHAEL. D. SIMMERS,
Defendants**

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:
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NO. 1:CV-01-1057

(JUDGE RAMBO)

UNSWORN DECLARATION OF BARBARA A. WILHELM

I, **BARBARA A. WILHELM**, hereby state based on my personal knowledge and under penalty of perjury that the following is true and correct:

1. I am the plaintiff in the above-captioned matter.
2. I expenses in the amount of \$ 28,872.15 in connection with litigation of the above-captioned matter.
3. The attached sheet details cost that I incurred with respect to this litigation.


BARBARA A. WILHELM

DATED: May 5, 2003

EXPENSE RECORD OF BARBAR A. WILHELM

1/28/2002 Geiger & Loria Reporting Service \$ 281.10
Deposition- R. Morris

1/30/2002 Geiger & Loria Reporting Service \$ 481.20
Depositions-R. Merryman, G. Rain, L. Bonney

2/28/2002 Geiger & Loria Reporting Service \$ 386.00
Deposition- P. Evanko

1/31/2002 Geiger & Loria Reporting Service \$ 449.90
Deposition- B. Wilhelm

3/20/2002 Filius & McLucas Reporting Service \$ 618.00
Depositions- R. Plesco, S. Burkholder, R. Polek

3/21/2002 Geiger & Loria Reporting Service \$ 492.40
Depositions- S. Spigelmyer, R. Balsbaugh, M. Simmers

3/22/2002 Geiger & Loria Reporting Service \$ 164.80
Deposition-T. Coury

3/27/2002 Geiger & Loria Reporting Service \$ 173.20
Deposition- R. Hickes

3/14/2002	Pay to Geiger & Loria Reporting Service Deposition Transcript of Jeffrey Miller Deposition Transcript of William McHale Deposition Transcript of Janet McNeal	\$ 571.50
9/5/2002	Geiger & Loria Reporting Service Deposition Transcript of James Hazen	\$ 83.60
11/15/2002	Pay to Geiger & Loria Reporting Service Deposition Transcript of Robert Murphy, CPA	\$ 78.70
12/26/2002	Pay to Geiger & Loria Reporting Service Deposition Transcript of Oveta Johnson	\$ 243.20
1/7/2003	Pay to Precision Reporting, Inc. Deposition Transcript of Gary S. Barach, CPA	\$ 920.55
<hr/>		
1/7/2003	Pay to Barach & Company Inc. for attending deposition	\$1,100.00
<hr/>		
11/19/2002	Pay to Boyer & Ritter, CPA	\$13,465.00
1/11/03	Pay to Boyer & Ritter, CPA	\$ 3,905.00
2/3/03	Pay to Boyer & Ritter, CPA	\$ 3,396.00
<hr/>		
11/6/2002	Pay to Vicki Fox US Court Reporter Testimony of Barbara Wilhelm on 9/10, 9/11, and 10/23/02.	\$ 104.25
1/8/2003	Pay to Vicki Fox, US Court Reporter Trial testimony of Brown, Conley, Polek, and Bonney	\$ 282.00
1/28/2003	Pay to Vicki Fox, US Court Reporter (Testimony of Hickes, Simmers, Rain, and Horgas)	\$ 207.00
1/9/2003	Pay to Vicki Fox, US Court Reporter Testimony of Miller, Evanko and Coury	\$ 270.00
2/13/2003	Pay to Vicki Fox, US Court Reporter Transcript of entire hearing on equitable relief held on 1/31/03	\$ 633.00

9/3/2002	Displays & Graphics	\$ 54.06
Plaintiff Exhibit #1 at Trial, on` PSP Organizational Chart.		

8/30/02	The Phillips Group	\$ 4.23
Plaintiff Exhibit Stickers		

2/8/2002	Susquehanna Internal Medicine Associates	\$ 22.78
Copy Medical Records for Defendants		

1/28/2002	Fifth Street Parking Garage	\$ 12.00
Attend Morris Deposition		

1/31/2002	Fifth Street Parking Garage	\$ 12.00
Attend my Deposition		

9/4/2002	Fifth Street Parking Garage	\$ 6.00
Attend Jury Selection		

9/9/2002	Fifth Street Parking Garage	\$ 12.00
Attend Trial		

9/10/2002	Fifth Street Parking Garage	\$ 12.00
Attend Trial		

9/11/2002	Fifth Street Parking Garage	\$ 12.00
Attend Trial		

9/12/2002	Fifth Street Parking Garage	\$ 2.00
Post Trial		

10/23/2002	Fifth Street Parking Garage	\$ 4.00
Attend Equity Hearing		

11/15/2002	Walnut Street Parking Garage	\$ 5.00
Attend Murphy Deposition		

1/31/03	Walnut Street Parking Garage	\$ 12.00
Attend Equity Hearing		

6/13/2001	Mail Boxes etc. (492 Copies)	\$ 26.08
6/14/2001	Mail Boxes etc. (208 Copies)	\$ 11.02
6/14/2001	Mail Boxes etc. (8 Laminates/binding)	\$ 12.72
6/15/2001	Mail Boxes etc. (637 Copies / 5 laminates/binding)	\$ 52.84
8/7/2001	Mail Boxes etc. (5 office supplies)	\$ 2.07
8/7/2001	Mail Boxes etc. (249 Copies)	\$ 13.20
8/10/2001	Mail Boxes etc. (21 Copies)	\$ 2.67
11/9/2001	Mail Boxes etc. (59 Copies)	\$ 5.00
4/15/2002	Mail Boxes etc. (188 Copies and laminate)	\$ 13.67
5/8/2002	Mail Boxes etc. (1,073 Copies/ 4 Office Supplies)	\$ 52.46
6/6/2002	Mail Boxes etc. (1,322 Copies)	\$ 49.05
8/16/2002	Mail Boxes etc. (326 Copies)	\$ 17.28
9/3/2002	Mail Boxes etc. (2748 Copies / 8 office supplies)	\$ 105.34
10/21/2002	Mail Boxes etc. (13 Copies)	\$ 10.38
11/14/2002	Mail Boxes etc. (247 copies / 2 office supplies)	\$ 25.13
12/24/2002	Mail Boxes etc.	\$ 1.17

(11 Copies)

1/8/2001	U.S. Postal Certified Mail	\$ 3.76
	EEOC	

8/12/2001	U.S. Postal Certified Mail	
	Lt. Col. Coury	\$ 2.67
	Barbara Christie	\$ 2.67
	Colonel Evanko	\$ 2.67
	Captain Simmers	\$ 2.67

1/16/2002	U.S. Postal Certified Mail	\$ 3.94
	EEOC	
